

# **EXHIBIT A**

TO THE DECLARATION OF MICHAEL C. HARTMERE



Michael C. Hartmere

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Michael Hartmere's practice areas include complex commercial litigation, class action defense, securities litigation and intellectual property litigation. He represents clients in litigation arising from disputes among commercial parties to complicated business transactions, as well as defending class actions involving advertising, marketing and consumer protection issues.

Mr. Hartmere was the principal draftsman of a motion to dismiss a consumer class action alleging fraud and deceptive marketing practices brought by nine graduates against their former law school, which recently resulted in dismissal of all claims. He is currently defending a major producer of poultry products in a putative consumer class action lawsuit alleging deceptive and unfair trade practices. He has recently represented: a foreign consumer products corporation and several of its officers in a multidistrict litigation involving deceptive trade and marketing practices claims; a domestic coal company and a French cosmetics distributor in separate complex breach of contract matters; and a non-profit credit counseling company in a class action suit involving claims of violations of a consumer protection statute.

Prior to joining Venable, Mr. Hartmere clerked for the Honorable Kevin Thomas Duffy of the U.S. District Court for the Southern District of New York. He was also a litigation associate at Simpson Thacher & Bartlett LLP.

#### AREAS OF PRACTICE

Commercial Litigation  
Class Action Defense  
Litigation  
Advertising and Marketing  
Litigation  
Advertising and Marketing  
Class Action Defense  
Securities Class Action  
Defense

#### BAR ADMISSIONS

Connecticut  
New York

#### COURT ADMISSIONS

U.S. District Court for the  
Southern District of New  
York  
U.S. District Court for the  
Eastern District of New York

#### EDUCATION

J.D., Fordham University  
School of Law, 2001  
Senior Notes &  
Comments Editor,  
*Fordham Intellectual  
Property, Media &*

#### ACTIVITIES

Mr. Hartmere is the vice chair of the firm's Class Action Defense Group and a former member of the Administrative Law Committee of the Association of the Bar of the City of New York.

*Entertainment Law  
Journal*, 2000-2001

B.A., Colgate University,  
1997

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**JUDICIAL CLERKSHIPS**

Honorable Kevin Thomas  
Duffy, U.S. District Court for  
the Southern District of New  
York, 2001 - 2002

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**MEMBERSHIPS**

New York State Bar  
Association

Association of the Bar of the  
City of New York

American Bar Association